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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH CENTRAL DIVISION

ELIZABETH HERNANDEZ,

Plaintiff,

vs.
ROB KOLKMAN,
CONSTABLE KOLKMAN
LLC, and JOHN DOES 1-5,

Defendants.

**EX PARTE MOTION FOR
OVERLENGTH
MEMORANDUM**

Case Number: 2:23-cv-00772

Judge: Ann Marie McIff Allen
Magistrate Judge: Daphne A. Oberg

Plaintiff respectfully requests this Court to permit Plaintiff to file a Reply Memorandum in Support of Motion for Partial Summary Judgment that exceeds the 20-page limit by six additional pages for a total of 26 pages plus a Table of Contents page pursuant to DUCivR 7-1.

Plaintiff's introduction, arguments, and conclusion consist of only 17 pages and are therefore contained well-within this Court's normal 20-page requirement. The additional pages are only necessary to accommodate Plaintiff's responses to Defendant's Statement of Additional Material Facts and to provide citations to the record to establish how those statements are contradicted by the evidence, improper under established law, or otherwise immaterial.

Plaintiff's Reply must address these issues thoroughly in order to assist the Court in resolving the motion on a full and accurate record. Despite diligent

efforts to condense the reply, Plaintiff cannot fully and fairly respond within the 20-page limit without sacrificing clarity or omitting necessary information.

Plaintiff therefore respectfully submits that a 26-page reply is both reasonable and appropriate under the circumstances, and that no party will be prejudiced by the additional length.

DATED 7/17/2025

Eric Stephenson

Attorney for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on 7/17/2025 I served the foregoing EX PARTE MOTION FOR OVERLENGTH MEMORANDUM to all counsel of record through this Court's electronic filing system.

/s/ Eric Stephenson

Attorney for Plaintiff